Exhibit 18

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

JOHN BRADLEY,)
Plaintiff,) Civil Action No. 1:13-cv-12927-IT
V.)
TIMOTHY J. CRUZ (Individually), MICHAEL HORAN (Individually), EDANK I MIDDLETON (Individually))))
FRANK J. MIDDLETON (Individually), AND THE OFFICE OF THE DISTRICT ATTORNEY FOR PLYMOUTH)))
COUNTY,)
Defendants.)))

AFFIDAVIT OF DONNA CRUISE

- My name is Donna Cruise. I was hired by the Plymouth County District
 Attorney's Office ("PCDAO") in September 1986. I became the Chief Financial Officer in 2003.
 As of the date of this Affidavit, I am still the Chief Financial Officer.
 - 2. I am making this affidavit based on my personal knowledge.
- 3. As Chief Financial Officer for the PCDAO, I keep salary and bonus information for each employee in the regular course of business.
- 4. Assistant District Attorney Suzanne Dunleavy McDonough was hired in June 2003. She received one \$1,000 bonus, eight salary increases, and was promoted in 2012 to Deputy Chief of the Family Protection Unit.
- 5. Assistant District Attorney Amanda Fowle was hired in February 2011. She received one \$1,000 bonus and one salary increase since 2012.

- 6. Victim Witness Advocate Mary Glavin was hired in November 1985. During Timothy Cruz's tenure as the Plymouth County District Attorney, she received one bonus and four salary increases.
- 7. Assistant District Attorney Karen O'Sullivan was hired in February 1996. During Timothy Cruz's tenure as the Plymouth County District Attorney, she received nine salary increases and three bonuses before she left the PCDAO in November 2012.

Signed under the pains and penalties of perjury, this $\underline{\omega}^{\uparrow}$ day of January, 2016.

Donna Cruise

Olsice M. Coymac Notary Public

My Commission Expires: 3/26/2020